

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-34

REQUEST: Verizon Massachusetts' Information Requests to WorldCom, Inc.

DATE: February 14, 2002

VZ-WCOM 2-1: On page 8 of the Direct Testimony of Karen K. Furbish, it states that "CAP services are always priced lower than incumbent LECs' Special Access services." Please provide any and all documents in support of that statement as it relates specifically to Massachusetts.

Respondent: Karen K. Furbish

RESPONSE: The point of that section of my testimony was that Verizon's facilities are ubiquitous and that economical competitive alternatives to Verizon's facilities are rarely available to WorldCom in instances where WorldCom does not itself have available facilities. That remains the case. Having re-read my testimony on this specific point, however, I believe it is not entirely accurate and I wish to take this opportunity to correct it. The message my testimony should have conveyed is not that CAPs "always" have lower prices than Verizon, but rather that WorldCom will purchase access circuits from a CAP or other CLEC where facilities are available and it is economical to do so. Deciding whether a competitive alternative to Verizon is viable is based not only on the prices that the CAP or CLEC charges, but also on other considerations, such as the ease of accessibility to the customer's building and facilities and whether WorldCom has already purchased pre-existing arrangements for the customer from the ILEC.

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VZ-WCOM 2-2: On page 8 of the Direct Testimony of Karen K. Furbish, it states that "only about 10% of WorldCom's 'off-net' requirements are met by other CAPs or CLECs." Please provide any and all documents in support of that statement as it relates specifically to Massachusetts.

Respondent: Karen K. Furbish

RESPONSE: The Massachusetts-specific percentage of buildings in which WorldCom has purchased "off-net" special access connectivity through CAPs or CLECs is 7.1%. In other words, for the universe of Massachusetts buildings in which WorldCom has customers that are not served via WorldCom's own facilities (*i.e.*, they are not "on-net" or "Tier 1" customers, but are "Tier 2" customers served "off-net" via the facilities of other carriers), WorldCom has purchased its special access connectivity from Verizon in approximately 93% of those buildings. This percentage was determined first by identifying the number of "off-net" buildings in which WorldCom has purchased access from Verizon and the number of "off-net" buildings in which WorldCom has purchased access from CAPs/CLECs. WorldCom then divided the number of buildings with WorldCom "off-net" CAP/CLEC connectivity by the total number of buildings with WorldCom "off-net" connectivity.

The specific calculation appears on the attachment to this response. WorldCom considers this attachment to be proprietary and confidential and will provide this information to parties subject to the terms of a mutually acceptable Protective Agreement.